

DeAurdrea Franczak (Long)
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June 12, 2025

Via Electronic Filing
Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Supplemental Filing – Docket No. C-2025-3055351

Complainant: DeAurdrea Franczak (Long)

Respondent: PPL Electric Utilities Corporation

To Whom It May Concern:

Please accept this correspondence as a formal submission of supplemental materials in the above-referenced matter. Complainant respectfully submits the following documents for inclusion in the case record:

1. Supplemental Filing – Clarification of Allegations and Legal Basis for Formal Complaint
2. Supplemental Case Summary Table
3. Notice of Intent to Supplement with Expert Opinion

These materials are submitted to further clarify the factual and regulatory basis of the complaint and to advise the Commission of Complainant's intent to introduce a written expert opinion addressing technical and billing-related aspects of the dispute.

Thank you for your time and attention.

Respectfully submitted,

/s/ DeAurdrea Franczak (Long)

DeAurdrea Franczak (Long)

Complainant, Pro Se

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DeAurdrea Franczak (Long),
Complainant,

v.

PPL Electric Utilities Corporation,
Respondent.

Docket No. C-2025-3055351

Supplemental Filing – Clarification of Allegations and Legal Basis for Formal Complaint

Complainant respectfully submits this supplemental filing to clarify and reinforce the legal sufficiency of the formal complaint filed with the Pennsylvania Public Utility Commission (PUC). This clarification addresses potential concerns previously cited by the Commission in unrelated cases, where complaints were dismissed for lacking specific legal or regulatory allegations.

Specifically, Complainant asserts the following:

- Complainant identified and documented improper and unexplained spikes in billed usage, inconsistent with prior historical usage trends, despite being enrolled in a budget billing program. This raises a potential violation of **52 Pa. Code § 56.12(4)(ii)–(iv)**, which requires utilities to ensure accurate metered usage and provide explanations for billing variances.

- Formal disputes were filed by Complainant with PPL, the PUC, the Consumer Financial Protection Bureau (CFPB), and national credit reporting agencies, thereby activating the dispute mechanism required under **52 Pa. Code § 56.141**.
- The billing ledger provided by PPL begins on April 13, 2021. However, Complainant resided at the service address since April 2020. Thus, over one full year of billing data is missing, preventing full verification and contradicting recordkeeping obligations expected of a utility pursuing a collection.
- PPL's billing summary concludes with an entry explicitly marked 'charge off,' yet no explanation of this designation has been provided. Complainant contends this may indicate the account was closed or otherwise resolved internally, and should not have been assigned for external collection.
- Under **66 Pa. C.S. § 701**, the PUC has jurisdiction over any formal complaint alleging that a utility's action, omission, or practice violates any applicable law, rule, or order. Complainant's complaints fall squarely within that framework. PPL's refusal to provide full billing transparency, its placement or assignment of a disputed debt, and its omission of proper notifications to collection agencies all constitute actionable issues worthy of review.
- This case is distinguishable from prior complaints dismissed by the Commission for lack of specificity. In those matters, complainants made no specific allegations, cited no billing code violations, and failed to dispute the charges. In contrast, Complainant here provides legal citations, identifies specific billing irregularities, and submitted timely disputes.

Conclusion:

Complainant respectfully requests that this matter proceed to full investigation and adjudication, with consideration of the billing discrepancies, regulatory concerns, and documentation establishing a good-faith and specific dispute. The issues raised involve both procedural and substantive violations warranting Commission review under applicable Pennsylvania Utility Code provisions.

Respectfully submitted,

/s/ DeAurdrea Franczak
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Pro Se Complainant

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DeAurdrea Franczak (Long),
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v.

PPL Electric Utilities Corporation,
Respondent.

Docket No. C-2025-3055351

PUC Supplemental Case Summary Table

Date	Event	Significance
April 1,2020	Complainant begins electric service at disputed address	Establishes service start date; relevant to missing billing ledger records
December 2022	Complainant contacts PPL customer service to discuss billing concerns regarding December bill	Establishes the initial inquiry to billing concerns raised directly with PPL
Jan 30, 2023	PUC Informal Complaint submitted	Demonstrates early good faith dispute prior to widespread media coverage or litigation
Feb 2023 – June 2023	Communications and responses from PPL regarding informal complaint	Establishes timeline of unresolved dispute and utility’s limited internal review
March 22, 2023	Communications from PUC-BCS division	Establishes timeline of unresolved dispute and

	regarding informal complaint filing	utility's limited internal review
October 2, 2023	Complainant ends electric service at disputed address	Establishes service end date; relevant to missing billing ledger records
December 11, 2023	PPL sells or assigns debt to I.C. System Inc., despite unresolved dispute	Central to alleged procedural violation and improper third-party assignment
May 2, 2024	CFPB Complaint filed against I.C. System Inc.,	Initiates federal regulatory notice of FCRA/FDCPA violation
May 5, 2024	TransUnion dispute filed regarding IC System Inc., collection	Invokes FCRA dispute obligations; timeline tied to TransUnion deletion
June 15, 2024	IC System Inc., account deleted from TransUnion report	Supports claim that debt was not validated or verified by furnisher
Sep 11, 2024	Torres Credit Services Inc., mails validation letter to former Pennsylvania address	Triggers FDCPA obligations; misdirected notice supports consumer rights violation
May 8, 2025	CFPB Complaint filed against Torres Credit Services Inc.,	Initiates federal regulatory notice of FCRA/FDCPA
May 12, 2025	Torres collection deleted from Experian following CFPB and Experian disputes	Strong evidence that validation failed or was insufficient

May 22, 2025

Formal PUC Complaint
filed (Docket No.
C-2025-3055351)

Triggers jurisdictional
review and expands factual
record of billing dispute

June 2025

Preparation to supplement
PUC complaint with expert
opinion

Strengthens evidentiary
support and signals
escalation of claim for
regulatory enforcement

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

DeAurdrea Franczak (Long), Complainant,

v.

PPL Electric Utilities Corporation, Respondent.

Docket No. C-2025-3055351

NOTICE OF INTENT TO SUPPLEMENT WITH EXPERT OPINION

Complainant, DeAurdrea Franczak (Long), hereby provides formal notice to the Pennsylvania Public Utility Commission (PUC) of her intent to supplement the record in this matter with the written opinion of an independent utility billing and metering expert.

The forthcoming expert opinion is anticipated to address the following:

1. The presence of unexplained spikes in billed usage in late 2022 inconsistent with historical consumption and contrary to budget billing expectations;
2. The apparent absence of a complete account ledger, with records currently beginning April 13, 2021, despite Complainant's residence at the service address since April 2020;
3. The utility's obligations under **52 Pa. Code § 56.12(4)(ii)-(iv)** to ensure accurate metering and explain significant billing variances;
4. The impact of PPL Electric Utilities' public admissions regarding widespread billing and metering issues on the credibility of the charges in dispute;
5. The implications of the "charge off" designation on the billing summary provided by PPL, including whether such an entry signals internal account resolution are inconsistent with subsequent third-party collection activity.

Complainant is actively engaging a qualified expert with knowledge of utility rate structures, metering systems, and Pennsylvania utility regulations. Once secured, the experts' report will be submitted in a timely manner and served upon the Respondent and the Commission in accordance with procedural rules.

Complainant submits this notice to provide transparency, assist in efficient adjudication of the matter, and affirm her intent to present well-supported and technically sound evidence.

Respectfully submitted,

/s/ DeAurdrea Franczak (Long)
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11405 Warwick Pointe Apt 202
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Complainant, Pro Se

Dated: June 12, 2025

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PROOF OF SERVICE

I, DeAurdrea Franczak, hereby certify that I have this day served a true and correct copy of the **Supplemental Filing – Clarification of Allegations and Legal Basis for Formal Complaint, Supplemental Case Summary Table and Notice of Intent to Supplement with Expert Opinion** upon the following parties via electronic mail, in accordance with the rules governing service of pleadings before the Pennsylvania Public Utility Commission.

Service by Email:

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Served via eService June 12, 2025

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Served via eService June 12, 2025

I certify under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,
/s/ DeAurdrea Franczak
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